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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AHMED ARFA, Individually And On Behalf of All Others Similarly Situated,

Plaintiff.

VS.

MECOX LANE LIMITED, NEIL NANPENG SHEN, JOHN J. YING, PAUL BANG ZHANG, ALFRED BEICHUN GU, KELVIN KENLING YU, ANTHONY KAI YIU LO, DAVID JIAN SUN, UBS AG, and CREDIT SUISSE SECURITIES (USA) LLC,

Defendants.

WALTER P. BRADY, Individually And On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

MECOX LANE LIMITED, NEIL NANPENG SHEN, JOHN J. YING, PAUL BANG ZHANG, ALFRED BEICHUN GU, KELVIN KENLING YU, ANTHONY KAI YIU LO, DAVID JIAN SUN, UBS AG, CREDIT SUISSE SECURITIES (USA) LLC, OPPENHEIMER & CO. INC. and ROTH CAPITAL PARTNERS, LLC.

Defendants.

CIVIL ACTION NO. 10-cv-9053

CIVIL ACTION NO. 11-cv-0084)

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NOTICE OF MOTION AND MOTION OF THE WESTEND GROUP TO CONSOLIDATE RELATED ACTIONS; TO BE APPOINTED LEAD PLAINTIFF; AND

TO APPROVE PROPOSED LEAD PLAINTIFF'S CHOICE OF COUNSEL

PLEASE TAKE NOTICE that the Westend Group (comprised of Westend Partners, L.P.

and the Cooper Family Trust) hereby moves the Court to consolidate all future related securities

class actions filed against Mecox Lane Limited and other defendants, to be appointed Lead

Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995, and to approve its

selection of the law firms of Kahn Swick & Foti, LLC and Pomerantz Haudek Grossman &

Gross, LLP as Co-Lead Counsel for the Class in this action. In support of this Motion, Westend

Group submits herewith a Memorandum of Law and supporting materials.

Dated: February 1, 2011

Respectfully submitted,

## KAHN SWICK & FOTI, LLC

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Counsel for Westend and Proposed Co-Lead Counsel for the Class

## **CERTIFICATE OF SERVICE**

I hereby certify that this Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on February 1, 2011.

/s/ Kim E. Miller Kim E. Miller